

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

MEDFORD DIVISION

UNITED STATES OF AMERICA

Case No. 1:16-CR-00203-MC

SUPERSEDING
INDICTMENT

v.

**Counts 1 through 8: Threats against the President
of the United States**

18 U.S.C. § 871

JOHN MARTIN ROOS,

Defendant.

**Counts 9 through 10: Threats against Federal Law
Enforcement Officers**

18 U.S.C. §§ 115 and 1114

**Counts 11 through 14: Possession of Unregistered
Destructive Device**

26 U.S.C. §§ 5861 and 5871

THE GRAND JURY CHARGES:

COUNT 1

(Threats against the President of the United States)

On or about March 16, 2016, in the District of Oregon, the defendant, JOHN MARTIN ROOS, did knowingly and willfully make a threat to take the life of, kidnap, and to inflict bodily harm upon the President of the United States, specifically, by an internet posting on a social media site known as Twitter the words, "No he is not a good peson (sic), he is a low life muslim goatf-----, who will be killed as you will be and I will kill Obamna (sic) personally."

All in violation of Title 18, United States Code, Section 871(a).

COUNT 2
(Threats against the President of the United States)

On or about March 17, 2016, in the District of Oregon, the defendant, JOHN MARTIN ROOS, did knowingly and willfully make a threat to take the life of, kidnap, and to inflict bodily harm upon the President of the United States, specifically, by an internet posting on a social media site known as Twitter the words, "Freedom of speech unless yhuo (sic) tell the truth about Muslim animals, I say kill them all, starting with Obama, get me within 500 yards I do it."

All in violation of Title 18, United States Code, Section 871(a).

COUNT 3
(Threats against the President of the United States)

On or about March 17, 2016, in the District of Oregon, the defendant, JOHN MARTIN ROOS, did knowingly and willfully make a threat to take the life of, kidnap, and to inflict bodily harm upon the President of the United States, specifically, by an internet posting on a social media site known as Twitter the words, "Who gives a sh-- what a Muslim c--- says. I'll shoot the c--- and all the other muslim vermin in their face. I'll shoot Obama."

All in violation of Title 18, United States Code, Section 871(a).

COUNT 4
(Threats against the President of the United States)

On or about March 19, 2016, in the District of Oregon, the defendant, JOHN MARTIN ROOS, did knowingly and willfully make a threat to take the life of, kidnap, and to inflict bodily harm upon the President of the United States, specifically, by an internet posting on a social media site known as Twitter the words, "Remove the rag from her head lets remove all muslim animals head, I'll blow Obama's head off my pleasure. FBI pussies come and get me and die."

All in violation of Title 18, United States Code, Section 871(a).

COUNT 5
(Threats against the President of the United States)

On or about March 19, 2016, in the District of Oregon, the defendant, JOHN MARTIN ROOS, did knowingly and willfully make a threat to take the life of, kidnap, and to inflict bodily harm upon the President of the United States, specifically, by an internet posting on a social media site known as Twitter the words, "FBI f---- you better come and get me. I leave today to kill Obama, this nigger will never take over the U.S. I will kill him and patriots will you."

All in violation of Title 18, United States Code, Section 871(a).

COUNT 6
(Threats against the President of the United States)

On or about March 25, 2016, in the District of Oregon, the defendant, JOHN MARTIN ROOS, did knowingly and willfully make a threat to take the life of, kidnap, and to inflict bodily harm upon the President of the United States, specifically, by an internet posting on a social media site known as Twitter the words, "You don'tteach (sic) these animals you kill the little f--- and let the bodies rot in the streets. Obama I will kill you and gorilla face."

All in violation of Title 18, United States Code, Section 871(a).

COUNT 7
(Threats against the President of the United States)

On or about March 26, 2016, in the District of Oregon, the defendant, JOHN MARTIN ROOS, did knowingly and willfully make a threat to take the life of, kidnap, and to inflict bodily harm upon the President of the United States, specifically, by an internet posting on a social media site known as Twitter the words, "How much of this has to happen before the World wakes up and kills musim (sic) animals, everywhere. I'll start by Killing Obama F--- you FBI."

All in violation of Title 18, United States Code, Section 871(a).

COUNT 8
(Threats against the President of the United States)

On or about March 26, 2016, in the District of Oregon, the defendant, JOHN MARTIN ROOS, did knowingly and willfully make a threat to take the life of, kidnap, and to inflict bodily harm upon the President of the United States, specifically, by an internet posting on a social media site known as Twitter the words, "Yeah this is the only way to deal with muslim animals theyall (sic) need shot in the head. I'll start by shooting Obama the traitor in the face."

All in violation of Title 18, United States Code, Section 871(a).

COUNT 9
(Threats against Federal Law Enforcement Officers)

On or about January 31, 2016, in the District of Oregon, the defendant, JOHN MARTIN ROOS, did threaten to assault, kidnap, and murder Federal law enforcement officers, more specifically, Federal Bureau of Investigation Special Agents, with intent to retaliate against the Federal law enforcement officers on account of their performance of official duties, specifically, by an internet posting on a social media site known as Facebook the words, "FBI acts like they are something to be feared after ambushing American patriots in Oregon, they are pussies. We will snipe them with hunting rifles everywhere."

All in violation of Title 18, United States Code, Sections 115(a)(1)(B), (b)(4) and 1114.

COUNT 10
(Threats against Federal Law Enforcement Officers)

On or about March 19, 2016, in the District of Oregon, the defendant, JOHN MARTIN ROOS, did threaten to assault, kidnap, and murder Federal law enforcement officers, more specifically, Federal Bureau of Investigation Special Agents, with intent to retaliate against the Federal law enforcement officers on account of their performance of official duties, specifically, by an internet posting on a social media site known as Twitter the words, "Remove the rag from

her head lets remove all muslim animals head, I'll blow Obama's head off my pleasure. FBI pussies come and get me and die."

All in violation of Title 18, United States Code, Sections 115(a)(1)(B), (b)(4) and 1114.

COUNT 11
(Possession of Unregistered Destructive Device)

On or about April 28, 2016, in the District of Oregon, the defendant, JOHN MARTIN ROOS, did knowingly possess an improvised explosive device (IED #1), further described as a length of metal pipe approximately 4 inches long and having a diameter of approximately 1-1/4 inches, with fishing weights, fishing hooks and Phillips-drive screws attached, and containing an ammunition propellant known as Pyrodex, which IED was both a firearm and a destructive device within the meaning of Title 26, United States Code, Section 5845, subsections (a) and (f), and which was not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Sections 5861(d) and 5871.

COUNT 12
(Possession of Unregistered Destructive Device)

On or about April 28, 2016, in the District of Oregon, the defendant, JOHN MARTIN ROOS, did knowingly possess an improvised explosive device (IED #2), further described as a length of metal pipe approximately 4 inches long and having a diameter of approximately 1-1/4 inches, with fishing weights attached, and containing an ammunition propellant known as Pyrodex, which IED was both a firearm and a destructive device within the meaning of Title 26, United States Code, Section 5845, subsections (a) and (f), and which was not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Sections 5861(d) and 5871.

COUNT 13
(Possession of Unregistered Destructive Device)

On or about April 28, 2016, in the District of Oregon, the defendant, JOHN MARTIN ROOS, did knowingly possess an improvised explosive device (IED #3), further described as a length of metal pipe approximately 6 inches long and having a diameter of approximately 1-1/4 inches, with fishing weights attached, and containing an ammunition propellant known as Pyrodex, which IED was both a firearm and a destructive device within the meaning of Title 26, United States Code, Section 5845, subsections (a) and (f), and which was not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Sections 5861(d) and 5871.

COUNT 14
(Possession of Unregistered Destructive Device)

On or about April 28, 2016, in the District of Oregon, the defendant, JOHN MARTIN ROOS, did knowingly possess an improvised explosive device (IED #4), further described as a length of metal pipe approximately 3-1/2 inches long and having a diameter of approximately 3/4 of an inch, and containing an explosive propellant known as Pyrodex, which IED was both a firearm and a destructive device within the meaning of Title 26, United States Code, Section 5845,

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subsections (a) and (f), and which was not registered to him in the National Firearms Registration and Transfer Record.

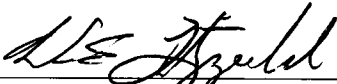
All in violation of Title 26, United States Code, Sections 5861(d) and 5871.

Dated this 4th day of August 2016.

A TRUE BILL.

Presented by:

BILLY J. WILLIAMS
United States Attorney



WILLIAM E. FITZGERALD
Assistant United States Attorney